Commonwealth of Kentucky Division for Air Quality

PERMIT STATEMENT OF BASIS

CONDITIONAL MAJOR (DRAFT PERMIT) No. F-06-007 CABINET CREATIONS LLC / CHRIS'S CUSTOM CABINETS BARDSTOWN, KY. AUGUST 24, 2006

MARK LABHART, REVIEWER

SOURCE I.D. #: 021-179-00048

SOURCE A.I. #: 39455 ACTIVITY #: APE20010002

SOURCE DESCRIPTION:

Cabinet Creations LLC, also known as Chris's Custom Cabinets, manufactures finished wood kitchen cabinetry. The primary source of emissions from this facility is from the spray coat finishing operations.

COMMENTS:

- Emission factors for the woodworking operation were provided by the consultant. These factors were compared against emission factors previously used by the Division for woodworking operations, and they were found to be comparable.
- Dust collection is integral to woodworking operations hence the filters will always be in operation whenever woodworking is occurring. Collection efficiency is assumed to be 90% for the filters and an additional 70% control efficiency is assumed for the building enclosure since there are no external exhausts from the dust control units.
- VOC and HAP emissions calculated by material balance.
- Federal regulation 40 CFR 63, Subpart JJ—National Emission Standards for Wood Furniture Manufacturing Operations is not applicable because of the conditional major limitations. Subpart JJ is applicable to major sources only.

EMISSION AND OPERATING CAPS DESCRIPTION:

Cabinet Creations LLC has requested voluntary permit limits of less than 9.0 tons per year of individual hazardous air pollutants (HAP), less than 22.5 tons per year of combined HAPs, and less than 90 tons per year of VOC.

PERIODIC MONITORING:

Cabinet Creations shall report VOC and HAP emissions semiannually.

OPERATIONAL FLEXIBILITY:

The source is not restricted as to hours of operation or quantity of product produced while remaining within the caps above.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.